

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO**

In re:

Steven Edward Schuholz,

Debtor.

Chapter 7

Case No. 1:18-bk-13108

Judge Beth A. Buchanan

**James T. Uren & Josephine Khoo-Smith, et
al.**

Plaintiffs

v.

Steven Edward Schuholz,

Defendant-Debtor.

ADV. PRO. NO. 1:18-ap-01071

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that the undersigned appears as counsel in this adversary matter only (Robert A. Goering, Esq. will remain counsel for debtor in the underlying bankruptcy Case No. 1:18-bk-13108) for debtor Steven Edward Schuholz (“Debtor”) and herewith demands that all notices given or required to be given in this case be served upon the undersigned at the following address and telephone number:

Paul T. Saba, Esq.
STAGNARO, SABA &
PATTERSON CO., L.P.A.
2623 Erie Avenue
Cincinnati, Ohio 45208
513.533.2703
513.533.2713 (facsimile)
pts@sspfirm.com

Jeffrey M. Nye, Esq.
STAGNARO, SABA &
PATTERSON CO., L.P.A.
2623 Erie Avenue
Cincinnati, Ohio 45208
513.533.6714
513.533.6711 (facsimile)
jmn@sspfirm.com

Pursuant to Rule 2002(g) of the Federal Rules of Bankruptcy Procedure, and as contemplated by Sections 1109(b) and 102(1) of the Bankruptcy Code, the foregoing demand includes not only the notices referred to in the Rule and statutes specified above, but also includes, without limitation, notices of any application, motion, or other pleading, whether formal or informal, whether written or oral, and whether transmitted by mail, hand delivery, telephone, or facsimile: (1) that affects or seeks to affect in any way rights or interests of (a) the Debtor, (b) property in which the Debtor may claim an interest, (c) property in the possession, custody or control of the Debtor, or (d) claims against the Debtor or the estate; (2) that seeks to require any act, payment, or other conduct by; or (3) that in any manner affect the rights of Debtor.

PLEASE TAKE FURTHER NOTICE that Debtor intends that neither this notice of appearance nor any later appearance, pleading, claim or suit shall waive: (1) the rights of Debtor to have final orders in non-core matters entered only after de novo review by a District Judge; (2) the rights of Debtor to a trial by jury in any proceeding so triable in this case; (3) the right of Debtor to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which Debtor is or may be entitled, under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments Debtor expressly reserves.

Dated: December 14, 2018

Respectfully submitted,

/s/ Paul T. Saba

Paul T. Saba, Esq. (0063723)

Jeffrey M. Nye, Esq. (0082247)

STAGNARO, SABA & PATTERSON CO., L.P.A.

2623 Erie Avenue

Cincinnati, Ohio 45208

513.533.2703

513.533.2713 (facsimile)

paulsaba@sspfirm.com

Attorneys for Debtor

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Notice of Appearance and Demand for Service of Papers was served on December 14, 2018 upon the U.S. Trustee and on all registered ECF Participants, electronically through the court's ECF System at the email address registered with the Court:

Daniel McDermott, U.S. Trustee
Robert A. Goering, Attorney for Steven Schuholz
Brian P. O'Connor, Attorney for Plaintiffs

/s/ Paul T. Saba
Paul T. Saba, Esq. (0063723)